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May 16, 2022

**VIA ECF**

Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, Room 2260  
New York, NY 10007

Re: ***John Doe v. New York University; No. 20-cv-01343 (GHW)***

Dear Judge Woods:

Pursuant to the Case Management Plan (ECF Nos. 50, 59) in the above-captioned action, Plaintiff John Doe and Defendant New York University ("NYU") submit a joint letter ahead of the status conference scheduled for May 23, 2022.

1. NYU's request for a pre-motion conference ahead of its proposed motions for summary judgment as to all causes of action and its motion to exclude the expert testimony of Steven Shedlin was granted. (ECF No. 77). NYU's motions, if made, are due June 1, 2022. (ECF No. 59, *see also* Your Honor's Individual Rules of Practice in Civil Cases, 3.F). Similarly, Plaintiff's motion to limit the expert testimony of Dr. Stephanie Plancich, if made, is due June 1, 2022. There are no other existing deadlines, due dates, and/or cut-off dates.
2. There are no outstanding motions.
3. Both fact and expert discovery are complete in their entirety.
4. Pursuant to the Case Management Plan, the parties met and conferred about the prospect of settlement shortly after the close of fact discovery. Neither party has made any offer of settlement subsequent to Plaintiff's demand in his Amended Complaint.
5. The parties anticipate a trial of approximately 5-7 days. NYU takes no position as to whether or not this case is to be tried to a jury. Plaintiff has demanded that this case be tried to a jury.

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6. As discussed herein, NYU anticipates filing a motion for summary judgment.
7. NYU does not have any other issues it wishes to raise at this time. As outlined in Plaintiff's May 16, 2022 response to NYU's pre-motion conference letter, Plaintiff will be filing a motion to limit the expert testimony of Dr. Stephanie Plancich.

Respectfully submitted,

**Counsel for Plaintiff:**

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